

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiffs,

v.

**COMMONWEALTH OF PUERTO RICO,
et. al.**

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION IN COMPLIANCE WITH ORDER AT DOCKET 954

TO THE HONORABLE COURT:

COME NOW the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau, through the undersigned counsel, and respectfully allege and pray as follows:

1. On September 22, 2018, this Honorable Court issued an order noting that the monitoring phase will begin on October 8, 2018 and that no extension to this date will be allowed. The Court further ordered the Parties to submit, without exception, all final comments to the TCA by the close of business on Friday, September 28, 2018. (See Docket No. 954).

2. Pursuant to Paragraph 248 of the Agreement, the TCA had to submit its methodology to the Parties at least 90 days prior to the October 8, 2018 date. However, it was not until August 31, 2018 that the Parties received all of the documents related to the methodology to be used during the monitoring phase.¹

¹ On September 24, 2018, the Deputy TCA submitted the latest revised draft of the proposed methodology.

3. Notwithstanding the above, thanks to the diligent work of the PRPB's Reform office, the Commonwealth hereby informs this Honorable Court that in compliance with the Court's Order at Docket 954, today, it has submitted to the TCA its comments to the methodology for compliance review before close of business.

4. The Commonwealth looks forward on continuing discussions with the TCA and USDOJ on the methodology for compliance review. Moreover, the Commonwealth does not waive its right to make additional comments to the methodology and seeks the Court's assistance pursuant Paragraph 248 of the Agreement, to resolve any disputes that may arise involving the TCA's methodology.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and find defendants in compliance. It is also certified that the GPR has knowledge of the present motion.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this September 28th, 2018.

WANDA VAZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Acting Deputy in Charge of
General Litigation

SUSANA PENAGARICANO BROWN
Acting Director of Federal Litigation
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